

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

RANJITH KEERIKKATTIL

Plaintiff,

v.

FREEMAN A. HRABOWSKI, *et al.*
Defendants.

Civil Action No. WMN-13-02016

* * * * *

**PLAINTIFF'S MOTION FOR LEAVE TO FILE SUPPLEMENTAL
BRIEF IN SUPPORT FOR HIS MOTION TO RECONSIDER
BASED ON NEWLY ACQUIRED EVIDENCE**

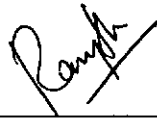
NOW COMES Plaintiff, Ranjith Keerikkattil, hereby files the following Motion for Leave to File Supplemental Brief in support of his Motion to Reconsider (ECF No. 27) Based on Newly Acquired Evidence, stating the following in support thereof:

1. Plaintiff filed his motion on October 21, 2013 under Rules 52(b), 59(e) and 60(b) of FRCP for an order amending this Court's September 23, 2013 order (ECF No. 20) partially granting the Defendants' motion to dismiss and denying the Plaintiff's motion for preliminary injunction as well as requested relief from the Court's judgment.
2. FRCP requires that Rule 59(e), titled "Motion to Alter or Amend a Judgment," states: "A motion to alter or amend a judgment must be filed no later than 28 days after the entry of the judgment." So the Plaintiff was required to file his motion by

October 21, 2013. During this time, Plaintiff was in discussions with Soutry De's attorney E. David Hoskins regarding a settlement offer he had extended to the Plaintiff.

3. Plaintiff signed the Settlement Agreement with Soutry De on October 22, 2013 and as part of the agreement, Soutry De turned over evidence against co-conspirators Paul Dillon and Jeff Cullen to the Plaintiff.
4. Among the evidence turned over to the Plaintiff were documents, e-mails and text messages that were unknown to the Plaintiff earlier and provides support to the allegations made in his complaint that were dismissed by this Court.
5. Hence, the Plaintiff seeks Leave to File Supplemental Brief in support of his Motion to Reconsider incorporating evidence provided by Soutry De to prevent injustice towards him.
6. A copy of Plaintiff's Supplemental Brief in support of his Motion to Reconsider is attached hereto.

Respectfully submitted,



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Plaintiff pro se

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 30th day of October, 2013, a copy of the foregoing was served by first class mail and electronic mail to:

Katherine D. Bainbridge
Assistant Attorney General
Office of the Attorney General
200 St. Paul Place, 17th Fl.
Baltimore, Maryland 21202-2021
kbainbridge@oag.state.md.us

